



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

75 Hawthorne Street
San Francisco, CA 94105-3901

December 15, 2011

Ms. Nona Tuchawena, Superintendent
Fort Apache Agency
Bureau of Indian Affairs
P.O. Box 560
Whiteriver, AZ 85941

Subject: No Further Action (NFA) for the Former UST Facility at the Whiteriver
Police Department in Whiteriver, AZ (EPA ID# WMAP-019)

Dear Ms. Tuchawena:

The U.S. Environmental Protection Agency (EPA) has reviewed the document entitled "Letter Report for the Investigative Sampling and Closure of One Former Underground Storage Tank Removal Site Located at Whiteriver Police Department" (closure report), dated September 8, 2011, that was prepared by Kary Environmental Services, Inc. (KES) for the Bureau of Indian Affairs (BIA). The closure report documents KES' soil sampling on August 2, 2011 in the area of the 10,000 gallon underground storage tank (UST) and dispenser that were formerly located at the Whiteriver Police Department (Facility). The sections below provide historical information on the Facility, a discussion of the closure confirmation sampling and analysis work, and the conclusions of the EPA and White Mountain Apache Tribe's (WMAT's) Environmental Protection Office (EPO) regarding the current status of the Facility.

Facility Background

The unsigned and undated UST notification form for the Facility in EPA's files indicates that a single 10,000 gallon UST, estimated to be over 15 years old, was used for storing gasoline. Based on the file records, EPA believes that the UST was operated from the 1980's until potentially early 2000 for fueling vehicles operated by the Whiteriver Police Department. Correspondence and dated photographs in EPA's files indicate that the UST was removed in April 2000 by BIA's contractor, The Verde Companies, Inc. However, EPA never received closure documentation or a closure report from BIA. The Arizona Corporation Commission's website indicates that The Verde Companies, Inc. was dissolved on February 14, 2001. Based on this date, it appears likely that The Verde Companies, Inc. went out of business prior to submitting any closure documentation for the Facility, or completing a closure report. The former UST area is currently an unpaved parking lot within a fenced compound operated by the Whiteriver Police Department.

UST Closure Confirmation Sampling and Analytical Data

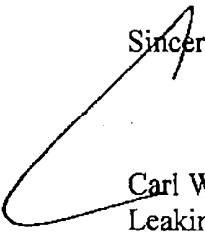
On August 2, 2011, KES collected subsurface soil samples at the Facility below the inferred, former locations of the UST's fill port, vent line and dispenser, based on the photographs taken by the WMAT's EPO in April 2000 during the UST closure. During the excavation work, there were no obvious hydrocarbon vapors in the ambient air, the backhoe excavations appeared free of hydrocarbon contamination, and the grab soil samples that had been placed in sealed plastic bags showed no VOC readings with the photo-ionization detector (PID).

All soil samples were collected from a backhoe bucket and were analyzed for the following: volatile organic compounds (VOCs) by EPA Method 8260B; total petroleum hydrocarbons (TPH) as gasoline by EPA Method 8015D; TPH as diesel and oil by Method 8015AZ; polynuclear aromatic hydrocarbons (PAHs) by EPA Method 8310; and total lead by EPA Method 6010B. The analytical results show no detections for VOCs and TPH, and the lead analyses appear consistent with background concentrations [the maximum lead concentration was 2.2 milligrams parts per kilogram (mg/kg)]. The analytical results also show no detections for PAHs except for fluorene and phenanthrene, which had maximum concentrations of 18 micrograms per kilogram (ug/kg) and 3.3 ug/kg, respectively. The low lead and PAH concentrations are also below EPA Region 9's Regional Screening Levels (RSLs) for a residential setting. In addition, the WMAT's nearest primary drinking water wells are located in Minor Flat, which is approximately 10 miles north of the Facility.

Conclusion

On December 14, 2011, Chris Prokop, of my staff, communicated the above-described closure confirmation findings via telephone with Terry Hill of the WMAT's EPO. Mr. Hill indicated that he supported closure of the Facility based on the field observations and the analytical data. Based on these findings, EPA and the WMAT's EPO are not requiring further action for the Facility at this time. However, if additional information becomes available in the future regarding hydrocarbon contamination in soil and/or groundwater, EPA or the WMAT's EPO may require additional site work. If you have any questions regarding this letter, please contact Mr. Prokop at (415) 972-3363.

Sincerely,


Carl Warren, Supervisor
Leaking Underground Storage Tanks Team

cc: Brenda Begay, Environmental Manager, EPO, WMAT
Terry Hill, Environmental Specialist, EPO, WMAT
Chris Prokop, EPA (copy to site file)